

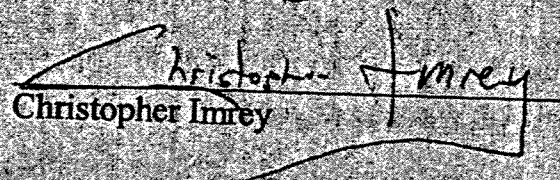
1 16. On February 24, 2005, I asked Anapoell to recommend new patent
2 counsel for Apollo.

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4 17. On February 28, 2005, Apollo hired Steve Smyrski to take over
5 Apollo's patent legal work. On March 1, 2005, Apollo requested that Neel and
6 Darrow forward all of Apollo's patent related files to Smyrski and asked them to
7 fill Smyrski in on all relevant details. Based on their extensive knowledge of
8 Apollo's technology and business model, Darrow and Neel worked closely with
9 new patent counsel Smyrski.

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11 18. Despite GT's sudden retreat from representing Apollo on its patent
12 work, GT continued to work on Apollo's corporate matters until late December,
13 2005. Such corporate work included drafting and negotiating contracts with
14 Apollo's customers and potential customers of the alleged infringing IDS system
15 (and the same potential customers of Debt Resolve). In December, 2005, I was
16 informed by Steve Anapoell that GT could not represent Apollo any further and
17 that the New York office of GT had asked him to disengage entirely, effective
18 immediately.

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20 19. GT billed Apollo for services and legal advice relating to the pivotal
21 issues in this litigation, including research of non-infringement issues (specifically
22 related to Debt Resolve's patents), multiple telephone conversations wherein Debt
23 Resolve was discussed and drafting of patents covering the very technology at
24 issue in this litigation. GT had access to and actually used Apollo's confidential
25 information including privileged communications with Apollo for its review and
26 analysis of Apollo's allegedly infringing product, contentions of possible
27 infringement, and examination of prior art in rendering its advice on Debt
28 Resolve's patents.

1 I declare under penalty of perjury under the laws of the United States of
2 America that the foregoing is true and correct and that I executed this declaration
3 on March 23, 2007 at Irvine, California.
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Christopher Imrey